

**From:** [Rachel Greengas](#)  
**To:** [Valdez, Heather](#); [Rob Hartman](#)  
**Cc:** ["Kelly Wright"](#); [susanh@ida.net](mailto:susanh@ida.net); [brian.english@deg.idaho.gov](mailto:brian.english@deg.idaho.gov); [Al Lam](#); **Ex. 6**; [vannoyj@dhw.idaho.gov](mailto:vannoyj@dhw.idaho.gov); [Williams, Jonathan](#); [Marguerite Carpenter](#); **Ex. 6**; [Ross, Carrie](#)  
**Subject:** RE: UPRR work on lines in front of FMC  
**Date:** Friday, August 12, 2016 2:47:13 PM  
**Attachments:** [image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.png](#)

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Heather,

The short answer is no, we do not provide any site training or provide monitors to UPRR workers or other owners/contractors working on non-FMC owned property. The UPRR work was maintenance of their mainline tracks located on their property.

As you know the only location within the FMC plant site where FMC workers and contractors are required to carry PH3 monitors is inside the RCRA Pond Area. Everyone who enters the RCRA Pond Area is trained on the RCRA Pond Area Work Rules. Whenever we are extracting and treating gas using the GES units at Pond 16S (or any other RCRA pond) continuous PH3 monitoring is in place to ensure that no PH3 is present in the area. We have not have any actionable (maximum reading in a 8-hr period above 1.0 ppm or a TWA above 0.30 ppm) PH3 readings from the continuous monitors at Pond 16S. We have not seen any actionable PH3 at the Pond 16S continuous monitors or during appurtenance and perimeter surface scan monitoring. Within the RCRA Pond area, there have been no worker (industrial hygiene) PH3 monitoring alarms at either the 0.30 ppm or 1.0 ppm alarm levels since GES operation began at Pond 16S on May 2, 2016. Phosphine is detected at high levels only in the gas which is being extracted from beneath the pond cap and treated in the GES units.

If we did get an actionable reading at one of the continuous monitors it would initiate a round of fenceline monitoring at 9 pre-designated points along the north property fenceline. These protocols, and others, are describing in the RCRA UAO - Air Monitoring Plan.

Let myself, Rob or Mark know if you have any additional questions.

Rachel

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**From:** Valdez, Heather [mailto:Valdez.Heather@epa.gov]  
**Sent:** Friday, August 12, 2016 12:57 PM  
**To:** Rob Hartman; Rachel Greengas  
**Cc:** 'Kelly Wright'; susanh@ida.net; brian.english@deq.idaho.gov; Al Lam; Mark Smith; vannoyj@dhw.idaho.gov; Williams, Jonathan; Marguerite Carpenter; Gary Resh; Ross, Carrie  
**Subject:** UPRR work on lines in front of FMC

Hi Rob and Rachel, How are you this morning? Susan let me know that UPRR and their contractors recently replaced all the lines in front of FMC.

Prior to that work by UPRR, did FMC do any training or provided notice concerning potential air emissions to workers, that would be near to the facility, particularly near to pond 16S north standpipe where we have been seeing elevated readings. Did you provide any hand held monitors or any other measures of assurance?

I do not have any new info to share on the letter timing as of yet.

Thanks!

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